



5. Given the important First Amendment rights at stake, it was appropriate for CNS to engage counsel with experience in First Amendment and national-firm resources, especially since CNS' attorneys had represented CNS in court-record access litigation for almost a decade before the lawsuit was filed.

6. BCLP provides CNS with discounted billing rates of at least ten percent for all BCLP timekeepers.

7. The hourly rate charged to CNS for the entirety of this case – 2018, 2019, and 2020 – was kept the same. This hourly rate was based off the 2018 rates, plus the approximate 10% discount.

8. For the period of April 1, 2018 through December 31, 2019, I have personally reviewed each monthly billing invoice pertaining to the above-captioned action before it was submitted to CNS for payment.

9. I have reviewed the itemized billing entries attached as exhibits to the declaration of William J. Hibsher and they accurately reflect portions of the time entries included in the regular monthly billing invoices that I reviewed and edited and that were submitted to CNS for payment that are now being sought as part of CNS' application for an award of attorneys' fees.

10. CNS paid in full all monthly billing invoices for time billed for the period April 1, 2018 through December 31, 2019, which include all those billing entries contained in the aforementioned exhibits.

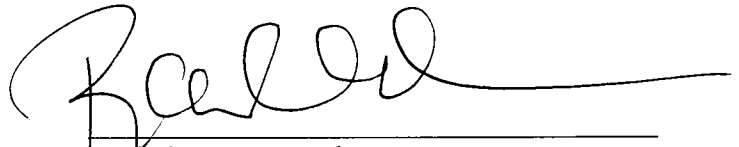
11. In addition, BCLP has billed CNS for time billed for the period January 1, 2020 through January 31, 2020 and expects to be paid in full in the usual course. I reviewed and edited this billing invoice, which includes time entries contained in the aforementioned exhibits.

12. BCLP has not yet billed CNS for the period February 1, 2020 to the filing of CNS' application for an award of attorneys' fees, but will submit to CNS a billing invoice in the usual course for payment, which BCLP expects to be paid in full in the usual course. Any billing invoice will include those time entries contained in the aforementioned exhibits.

13. In addition, BCLP has included in its billing invoices to CNS those costs associated with the above-captioned action. This includes the costs for retention of CNS' expert, Amita Kancherla, as well as all other costs associated with the above-captioned action, including filing fees, court reporters, transcripts, overnight and express mailing charges, and travel and accommodations for depositions, court hearings, and trial. CNS has paid in full all of the amounts that are included as part of the monthly billing invoices.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at San Francisco, California this 3rd day of March 2020.



Rachel Matteo-Boehm

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4th day of March, 2020, I electronically filed the foregoing with the Clerk of Court using CM/ECF system, which will send a notification of such filing to all counsel of record as listed below:

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